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Before the  
COPYRIGHT ROYALTY JUDGES  
Washington, D.C.

Copyright Royalty Board

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In the Matter of )  
)  
)

Distribution of the 2011 )  
Satellite Royalty Funds )  
\_\_\_\_\_ )

Docket No. 2012-10 CRB SD 2011

**COMMENTS OF THE BROADCASTER CLAIMANTS GROUP  
REGARDING MOTION FOR PARTIAL DISTRIBUTION  
OF 2011 SATELLITE FUNDS**

The Broadcaster Claimants Group ("BCG") files these comments in the above-referenced proceeding in response to the Notice issued by the Copyright Royalty Judges on January 18, 2013. 78 Fed. Reg. 4169 (Jan. 18, 2013). The Notice requests comments on the proposed partial distribution of 2011 satellite funds, as well as on the existence of Phase I and Phase II controversies with respect to the distribution of 2011 satellite funds.

BCG has joined the other Phase I parties in Comments being filed concurrently herewith that address the statutory basis and predicate upon which the parties' Motion was filed and should be granted. BCG responds below to the further questions posed by the Notice.

**A. Existence of Phase I Controversies**

With respect to the 2011 satellite funds, a Phase I controversy exists at the present time among BCG, Program Suppliers, Joint Sports Claimants, Devotional Claimants, and Music Claimants (the "Phase I Parties").

**B. Existence of Phase II Controversies**

With respect to the Phase II distribution of 2011 satellite royalties within the Broadcaster Claimants Group category, BCG is unaware of any controversy at this time. BCG is aware of

the existence of Phase II controversies between broadcaster claimants and other claimants within the Program Suppliers, Devotional, and Music categories. BCG, however, reserves its right to make or withdraw Phase II claims in response to the rulings of the Copyright Royalty Judges, the outcome of the 2011 Phase I satellite distribution proceedings, the acquisition of additional evidence, or the filings of additional claimant parties.

### **C. Conclusion**

As a signatory of the Motion of Phase I Claimants for Partial Distribution filed on December 12, 2012, seeking distribution of fifty percent of the 2011 satellite funds, BCG strongly supports distributing those funds, as described in the Motion. BCG believes there can be no reasonable justification for objecting to the distribution of the requested amounts.

BCG respectfully urges the Copyright Royalty Judges to make the partial distribution as requested.

Respectfully submitted,

**BROADCASTER CLAIMANTS GROUP**



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February 19, 2013

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 19th day of February, 2013, a copy of the foregoing  
Comments of the Broadcaster Claimants Group Regarding Motion for Partial Distribution of  
2011 Satellite Funds was sent by overnight mail to the following:

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